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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT
ON RESOLUTION OF ELEVENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY THE
STATUTE OF REPOSE) WITH RESPECT
TO CERTAIN CLAIMS**

[Re: Dkt. Nos. 11014, 11198, 11211]

**Regarding Objection Set for Hearing
October 19, 2021, at 10:00 a.m. (Pacific
Time)**

REPORT ON RESOLUTION OF CERTAIN CLAIMS

In advance of the October 19, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby report on the resolution of certain Claims in the following securities claims omnibus objection:

Docket No.	Omnibus Objection
11014	<i>Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)</i> (the “ Eleventh Securities Claims Omnibus Objection ”)

Docket No.	Claimant	Claim Nos.	Resolution
Eleventh Securities Claims Omnibus Objection			
11168	PGIM FI Claimants	100936, 100967, 100969, 101026, 101123, 100945, 101239, 101149, 101008, 101067, 100941, 101322, 101427	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11170	State of Oregon	100806, 100931	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11171	JIBEI Claimants	101683, 100193, 99659, 100084	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.

Docket No.	Claimant	Claim Nos.	Resolution
11172	Invesco Claimants	102249, 102188, 102179, 102021, 101437, 101894, 102228, 102172	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11177	KKR Claimants	101782, 101906, 101564, 101903, 101642, 101996	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11187	Hartford Claimants	100313, 100877, 101156, 101189, 101204, 101225, 101383, 101956, 101958, 101981, 102003, 102027, 102069	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11207	PepsiCo, Inc. Master Trust	98712	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to this Claim.
11203	AmeriTrust Claimants	103017, 103127, 104332	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11209	Vanguard Claimants	102343, 102344, 102457, 102566, 101946, 102309, 102518, 105272	The Eleventh Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.

With respect to each of the proofs of claim set forth above (the “**Proofs of Claim**”), the Eleventh Securities Claims Omnibus Objection objected thereto on the basis that the applicable statute of repose barred claims arising under Section 11 of the Securities Act of 1933 (the “**Securities Act Claims**”).

Each of the above claimants responded to the Eleventh Securities Claims Omnibus Objection and arguably purport to assert claims other than Securities Act Claims. They did not deny that the statute of repose was applicable to, and barred, their Securities Act Claims.

Rather than proceeding to seek to expunge only the Securities Act Claims and leave the Proofs of Claim partially denied and partially unresolved at this time, the Reorganized Debtors have withdrawn the Eleventh Securities Claims Omnibus Objection, without prejudice, with respect to the Proofs of Claim. The Reorganized Debtors currently intend to object to each of the Proofs of Claim. The Reorganized Debtors reserve the right to object to the Proofs of Claim on any basis, including but not limited to that the applicable statute of repose bars some or all of the claims asserted in the Proofs of Claim.

Dated: October 12, 2021

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors